

Exhibit G

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

ALIGN TECHNOLOGY, INC.,

Plaintiff,

v.

CLEARCORRECT OPERATING, LLC,
CLEARCORRECT HOLDINGS, INC.,
& INSTITUT STRAUMANN AG,

Defendants.

Civil Action No. 6:24-cv-00187-ADA-DTG

JURY TRIAL DEMANDED

CLEARCORRECT OPERATING, LLC,
CLEARCORRECT HOLDINGS, INC.,
& STRAUMANN USA, LLC,

Counterclaim-Plaintiffs,

v.

ALIGN TECHNOLOGY, INC.,

Counterclaim-Defendant.

**DEFENDANTS' AND COUNTERCLAIM-PLAINTIFFS' OBJECTIONS & RESPONSES
TO PLAINTIFF ALIGN'S FIRST SET OF REQUESTS FOR PRODUCTION (NOS. 1-44)**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants and Counterclaim-Plaintiffs ClearCorrect Holdings, Inc., and ClearCorrect Operating, LLC, Defendant Institut Straumann AG, and Counterclaim-Plaintiff Straumann USA, LLC (collectively, "ClearCorrect"), hereby provide the following Objections and Responses to Plaintiff and Counterclaim-Defendant Align Technology Inc.'s ("Align," "Plaintiff," or "Counterclaim-Defendant") First Set of Requests for Production (Nos. 1-44).

that it broadly seeks information without limitation of relevance to the accused functionalities or technology at issue in this litigation.

Based on its investigation to date, and subject to and without waiving the foregoing general and specific objections, ClearCorrect responds as follows:

ClearCorrect is willing to meet and confer with Align to discuss the purported relevance and proper scope of this Request, if any.

REQUEST FOR PRODUCTION NO. 23:

All briefing, supporting exhibits, responses to discovery requests, declarations, testimony, expert reports, and other documents that You produced, served, or filed in *SoftSmile, Inc. v. Institut Straumann AG et al.*, No. 22-cv-01189 (D. Del.), *Zircore, LLC v. Institut Straumann AG et al.*, No. 15-cv-01557 (E.D. Tex.), *Bay Materials, LLC v. 3M Company*, No. 21-cv-01610 (D. Del.) and any related mediation, arbitration, or inter partes review proceedings that refer or relate to Align, the Accused Products, the Align Products, or the Asserted Patents.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

ClearCorrect incorporates by reference its General Objections. In addition, ClearCorrect specifically objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it requests “[a]ll” “briefing,” “[a]ll” “supporting exhibits,” “[a]ll” “responses to discovery requests,” “[a]ll” “declarations,” “[a]ll” “testimony,” “[a]ll” “expert reports,” and “[a]ll” “other documents” including “[a]ll” “documents” “produced, served, or filed” in *SoftSmile, Inc. v. Institut Straumann AG et al.*, No. 22-cv-01189 (D. Del.), *Zircore, LLC v. Institut Straumann AG et al.*, No. 15-cv-01557 (E.D. Tex.), *Bay Materials, LLC v. 3M Company*, No. 21-cv-01610 (D. Del.) and “any related mediation, arbitration, or inter partes review proceedings” without limitation. ClearCorrect objects to this request because the terms “related,” “refer or relate,” and “the Align Products” are vague, ambiguous, overbroad, and do not describe with reasonable particularity the type of documents sought. ClearCorrect objects to this request to the extent it seeks documents equally accessible to Plaintiffs. ClearCorrect objects to this request

because it seeks documents that are not relevant to any claim or defense in the case to the extent that it broadly seeks information without consideration of relevance to the patents, accused functionalities, or technology at issue in this litigation. ClearCorrect objects to this request to the extent it seeks disclosure of documents or information that ClearCorrect is under an obligation to a third party not to disclose.

Based on its investigation to date, and subject to and without waiving the foregoing general and specific objections, ClearCorrect responds as follows:

ClearCorrect is willing to meet and confer with Align to discuss the purported relevance and proper scope of this Request, if any.

REQUEST FOR PRODUCTION NO. 24:

All documents that tend to substantiate, undermine, prove, or disprove, in whole or in part, Your claim for damages in the Counterclaims, including all documents that identify any lost customers, sales or revenues based on Align's conduct alleged in the Counterclaims.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

ClearCorrect incorporates by reference its General Objections. In addition, ClearCorrect specifically objects to this request as overbroad, unduly burdensome, and not proportional to the needs of the case to the extent that it requests "[a]ll documents" without limitation. ClearCorrect further objects to this request on the ground that it is vague, ambiguous, overbroad, and does not describe with reasonable particularity the type of documents sought to the extent that it seeks documents that "substantiate, undermine, prove, or disprove" any claim for damages. ClearCorrect further objects to this request as improper to the extent it calls for legal conclusions and/or premature to the extent it seeks expert discovery in advance of dates for disclosing such information set by the Court. ClearCorrect will disclose expert opinions in accordance with the applicable scheduling orders of the Court. ClearCorrect objects to this request to the extent that it

Dated: September 9, 2024

Respectfully submitted,

/s/ Marissa A. Lalli

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this document has been served on all counsel of record via electronic mail on September 9, 2024.

/s/ Marissa A. Lalli
Marissa A. Lalli